



# US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

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## VETERANS BENEFITS ADMINISTRATION

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# VBA Generally Helped Veterans Obtain Damaged or Destroyed Records

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## Executive Summary

In July 1973, a fire damaged or destroyed up to 18 million Army and Air Force official military personnel files (OMPF) at the National Archives and Records Administration's (NARA) National Personnel Records Center (NPRC) in St. Louis, Missouri. Such personnel files contained information necessary for veterans to file claims with VA. Prior to the fire, NARA had not produced copies and did not track where records were physically located within the NPRC. Accordingly, a complete listing of the records that were lost is not available. This disaster affected veterans who served in the Army or Air Force prior to 1960 or 1964, respectively. As a result, these veterans—who were about 87 years old on average at the time of their claims—may have difficulties obtaining damaged or destroyed records when filing claims for benefits and therefore might experience delays receiving those benefits.<sup>1</sup>

In the years following the fire, the NPRC initiated several records and recovery reconstruction efforts, which included using alternate sources outside of the NPRC to supplement the destroyed or damaged records. The NPRC collected numerous series of records (referred to as auxiliary records) that are used to reconstruct basic service information. As part of the reconstruction effort, the NPRC established a “burned registry” file to index the 6.5 million recovered records.

When a veteran submits a claim for VA benefits and does not have copies of their records, a veterans service representative submits a Personnel Information Exchange System (PIES) request for the service or treatment records from the NPRC.<sup>2</sup> If the veteran's branch and discharge date meet the criteria for records damaged in the fire, veterans service representatives must also simultaneously send the veteran a letter requesting information to reconstruct medical data and, if needed, a questionnaire about military service to gather information necessary to complete the medical treatment or military service record requests with required information such as service period, unit, location and medical treatment received.<sup>3</sup>

There are different extents to which the fire affected veterans' records. Burned files include records that were either burned or damaged in the fire or were near the fire area. For some burned files, the records may have been preserved aside from a small amount of water, fire, or mold exposure, and they contain all the veteran's records and are readable. These files, at a minimum, could be associated with a veteran and catalogued in the NPRC registry and are stored

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<sup>1</sup> “Veterans” as used throughout the report also refers to other claimants applying for benefits, such as surviving spouses or next of kin.

<sup>2</sup> PIES is a software application that manages requests for veteran information from records stored at the NPRC or maintained by individual branches of service. Requests may be for medical treatment or military service records.

<sup>3</sup> Veterans service representatives, also referred to as claims processors, explain benefit program and entitlement criteria, conduct interviews, identify issues, gather relevant evidence, and adjudicate claims. “Veterans Service Representatives (VSR)” (web page), VA, accessed August 23, 2022, <https://benefits.va.gov/BENEFITS/jobs/index.asp>.

in a designated temperature-controlled area of the NPRC storage facility. If a request for these records is received at the NPRC, the records are retrieved and sent to the restoration team for assessment of what procedures can be applied to restore the records. The amount of time the restoration process takes depends on the extent of damage and procedures applied to restore the documents.

If a veteran's records cannot be located because they were destroyed in the fire, a request for reconstruction of medical treatment records, military service records, or both, depending on the veteran's needs, is completed by a veterans service representative. A program support assistant at the Veterans Benefits Administration's (VBA) regional office in St. Louis, Missouri, reviews the reconstruction request information to ensure that records are not already available in the NPRC's registry. If records are not available, the program support assistant requests auxiliary records from the NPRC, which are any other documentation that corroborates when and where a veteran served, in what capacity, and any medical treatment or injuries that may have occurred.

Representative Salud Carbajal introduced language in the National Defense Authorization Act (NDAA) of 2023 related to the 1973 fire at the NPRC.<sup>4</sup> The NDAA required the VA Office of Inspector General (OIG) to report on how procedures that VBA outlines in its Adjudication Procedures Manual are followed when assisting veterans with obtaining or reconstructing service records and medical information that were damaged or destroyed during the fire.<sup>5</sup> The OIG therefore conducted this audit to assess VBA's assistance to these veterans with obtaining damaged or destroyed records. Pursuant to congressional mandate, the OIG focused on compliance with the process, related training, and the extent and length of time needed to process such requests but did not assess the overall claim or benefit decision's accuracy.

## What the Audit Found

VBA is responsible for assisting veterans whose records were damaged or destroyed in the 1973 NPRC fire. VBA's request system and data do not allow for the capability to track all types of fire-related records requests. The system can only potentially identify requests as fire-related where the initial responses are returned, they indicate the records may be fire-related, and a subsequent reconstruction request is completed. Additionally, since part of the process is completed manually by the program support assistants, the audit team was unable to use PIES data to determine how long after a veterans service representative submits a PIES reconstruction request that a program support assistant requests auxiliary records from the NPRC. The OIG estimated that from October 1, 2021, through September 30, 2022, completing a fire-related records reconstruction request took an average of 450 days from the date the claim was received

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<sup>4</sup> National Defense Authorization Act (NDAA) for Fiscal Year 2023, Pub. L. No. 117-263, sub. B, §5114 (2022).

<sup>5</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations," November 17, 2021, sec. 3.ii.2.F in *Adjudication Procedures Manual*.

to the date VBA decided the claim. In comparison, for the same period, VBA averaged 146 days to complete a non-fire-related claim.

VBA staff did not always follow procedures for the prompt handling of these record requests as outlined in its Adjudication Procedures Manual.<sup>6</sup> Veterans service representatives generally informed veterans of the actions necessary to complete a record request for fire-damaged or destroyed records; however, they did not always complete required follow-up procedures, such as calling the veteran.

VBA staff are not performing the steps in the order prescribed by the manual. The OIG estimated that 1,100 completed PIES fire-related reconstruction requests had procedural deficiencies (80 percent). Of those, the OIG estimated that veterans service representatives were not following procedures in the order outlined in the manual for medical treatment records and military service records 44 and 22 percent of the time, respectively.<sup>7</sup> This increased claim processing time by an average estimated 73 days. Additionally, veterans service representatives were unnecessarily requesting records when information was already available either from a previous request or in a paper file format or were submitting requests without obtaining complete veteran service information.

By receiving the letter explaining the fire-related procedures, veterans generally were being informed of the actions and forms necessary to complete a request for fire-related records. However, if the forms are returned with missing or incomplete information, the veterans service representative should attempt to contact the veteran by phone and if unsuccessful, a second letter should be sent to try and obtain the missing information.<sup>8</sup> The OIG found veterans service representatives did not complete these required follow-up procedures for an estimated 25 percent of reconstruction requests.

VBA's own special reviews have identified concerns with how veterans service representatives are processing PIES requests, including not following fire-related procedures.<sup>9</sup> Veterans service representatives were not sufficiently trained on fire-related records requests. In addition, there

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<sup>6</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations."

<sup>7</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations."

<sup>8</sup> VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13055," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(c); VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13075," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(f).

<sup>9</sup> VBA, Compensation Service Special Review, *Personnel Information Exchange System 099 Requests*, May 13, 2022; Special Focused Review, *Quality Assurance Personnel Information Exchange System 099 Requests*, February 13, 2023. A special-focused review is an evaluation conducted by VBA's Compensation Service into topics of special interest or where a need has been identified in an effort to assess consistency and compliance based on current policy and procedures.

was limited content about fire-related records request procedures in the training for newly hired veterans service representatives. Additional PIES record request training was added in May 2022. However, this training focused on how to complete the initial PIES request and did not specifically address how to handle those that are fire-related.

## **What the OIG Recommended**

The OIG recommended that VBA instruct veterans service representatives on the process for requesting service treatment and military service records for fire-related records and include more specific guidance on what information is required for the NPRC to locate veterans' records. Additionally, VBA should ensure veterans service representatives are made aware of and follow steps as outlined in the manual for when to send required forms and conduct follow-up contact with veterans. Further, the OIG recommended that VBA establish a process to identify and track veterans' records that have been determined to be fire-damaged or destroyed.

## **VA Comments and OIG Response**

The under secretary for benefits concurred with all recommendations and provided acceptable action plans on implementation. The full text of the under secretary's comments and action plan appear in appendix C.

The under secretary's planned corrective actions are responsive to recommendations and address the issues identified in the report. The OIG will monitor VBA's progress and follow up on the implementation of the recommendations until all proposed actions are completed.



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## Abbreviations

FY	fiscal year
NARA	National Archives and Records Administration
NDAA	National Defense Authorization Act
NPRC	National Personnel Records Center
OIG	Office of Inspector General
OMPF	Official Military Personnel Files
PIES	Personnel Information Exchange System
VBMS	Veterans Benefit Management System



## Introduction

On July 12, 1973, a fire damaged or destroyed approximately 16 to 18 million official military personnel files (OMPF) at the National Archives and Records Administration’s (NARA) National Personnel Records Center (NPRC) in St. Louis, Missouri.<sup>10</sup> This disaster affected veterans who served in the Army or Air Force prior to 1960 or 1964, respectively. As a result, these veterans may experience difficulties when filing claims for benefits and delays in receiving those benefits.<sup>11</sup>

Prior to the fire, NARA had not created copies of these records and did not have indexes to identify the records’ physical location within the NPRC. A complete listing of the lost records is unavailable; however, after the incident the NPRC created a “burned registry” that indexed 6.5 million records recovered from the fire. Figure 1 shows the extent of records affected by the fire.

Branch	Personnel and Period Affected	Estimated Loss
	Discharged November 1, 1912, to January 1, 1960.	80%
	Discharged September 25, 1947, to January 1, 1964 (with names alphabetically after Hubbard, James E).	75%

**Figure 1.** Personnel records affected by NPRC fire in 1973.

Source: NPRC Website: <https://www.archives.gov/personnel-records-center/fire-1973>.

Representative Salud Carbajal of California introduced language in the National Defense Authorization Act (NDAA) of 2023 related to the 1973 fire.<sup>12</sup> The NDAA required the VA Office of Inspector General (OIG) to report on the extent to which the procedures outlined in the Veterans Benefits Administration’s (VBA) Adjudication Procedures Manual are followed when

<sup>10</sup> An OMPF is a record of a veteran’s service history, such as dates of enlistment, separation, discharge, or retirement; duty stations and assignments; training, qualifications, and performance; and awards and decorations received. The information contained in an OMPF serves as verification of a veteran’s military service and is necessary for when a veteran files a claim for benefits.

<sup>11</sup> “Veterans” as used throughout the report also refers to other claimants applying for benefits, such as dependents and survivors.

<sup>12</sup> National Defense Authorization Act (NDAA) for Fiscal Year 2023, Pub. L. No. 117-263, sub. B, §5114 (2022).

assisting veterans with obtaining or reconstructing service records and medical information that were damaged or destroyed during the fire.<sup>13</sup>

The OIG conducted this audit to assess VBA's assistance to these veterans with obtaining damaged or destroyed records. Pursuant to the congressional mandate, the OIG focused on compliance with the process, related training, and the extent and length of time needed to process such requests; the OIG did not assess the overall claim or benefit decision accuracy. The NDAA required the OIG to review the following specific elements relating to VBA's procedures for assisting veterans who had damaged or destroyed records:

1. The average time it takes to resolve an issue using these procedures.
2. The percentage of cases regarding such service records and medical information in which VA employees follow these procedures.
3. Whether VA informs veterans of actions necessary to adhere to these procedures.
4. Whether VA employees receive sufficient training on these procedures.
5. Recommendations to improve the implementation of these procedures.

## Reconstruction Efforts

In the years following the fire, the NPRC initiated several records and recovery reconstruction efforts, which included using alternate sources outside of the NPRC to supplement the destroyed or damaged records. According to NARA, these alternate sources (referred to as auxiliary records) include VA claims files, individual state records, selective service system registration records, as well as medical records from military hospitals, entrance and separation x-rays, and organizational records.<sup>14</sup> They are used to reconstruct basic service information. The most common forms of auxiliary records found by NPRC are morning reports and clinical or payroll records.<sup>15</sup>

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<sup>13</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations," November 17, 2021, sec. 3.ii.2.F in *Adjudication Procedures Manual*, in *Adjudication Procedures Manual*.

<sup>14</sup> National Archives, reprint of Walter W. Stender and Evans Walker, "The National Personnel Records Center (NPRC) Fire: A Study In Disaster," *The American Archivist*, 37, no. 4 (October 1974), accessed July 27, 2022, <https://www.archives.gov/personnel-records-center/fire-1973>. According to VBA's Consolidated Support Division, organizational records are records created by specific organizations within the armed services and designed to document unit events involving members of that group.

<sup>15</sup> Morning reports are unit records that were filled out each day to reflect changes in duty status (such as gains, losses, leave, transfers, temporary duty, promotions) for personnel assigned to the unit. The entries show the service member's name, service number or social security number, rank, unit strength, location of the unit, and sometimes a Record of Events.

## Process for Requesting Fire-Related Records

The overall process for requesting fire-related records is complex and involves several different entities as shown in figure 2.



**Figure 2.** Entities involved in requesting fire-related records.

Source: VA OIG analysis.

Reviewing the process in more detail, when a veteran submits a claim for VA benefits and does not have copies of their records, a veterans service representative submits a Personnel Information Exchange System (PIES) request for the service or treatment records from the NPRC.<sup>16</sup> If the veteran’s branch and discharge date meet the criteria for records damaged in the fire, veterans service representatives must also simultaneously, with the initial PIES “Request for Information,” send the veteran a letter with a form requesting information to reconstruct medical data and, if needed, a questionnaire about military service to gather information necessary to complete the medical treatment or military service record requests.<sup>17</sup> This form and questionnaire ask for key information about the veteran’s service periods, unit, location, and medical treatment and are used to locate auxiliary records that could support the veteran’s claim.

The initial “Request for Information” which includes either a request for medical treatment records, military service records, or both is transmitted through PIES for processing by program support assistants assigned to VBA’s Centralized Support Division at its regional office in St. Louis, Missouri. If the program support assistant cannot locate a veteran’s records because

<sup>16</sup> PIES is a software application that manages requests for veteran information from records stored at the NPRC or maintained by individual military service branches. Requests may be for medical treatment or military service records, or both.

<sup>17</sup> Veterans service representatives, also referred to as claims processors, explain benefit program and entitlement criteria, conduct interviews, identify issues, gather relevant evidence, and adjudicate claims. “Veterans Service Representatives (VSR)” (web page), VA, accessed August 23, 2022, <https://benefits.va.gov/BENEFITS/jobs/index.asp>.

they are fire-related, this will be indicated in the PIES response to the veterans service representative, as well as what type of subsequent request should be completed if the veteran is able to provide information necessary to obtain records from an alternate source.

The veterans service representatives should use the information obtained from the veteran's returned form requesting information to reconstruct medical data, questionnaire about military service, or both to complete a PIES reconstruction request to obtain auxiliary records in support of the veteran's claim. If the form or questionnaire are returned with missing or incomplete information, the veterans service representative should attempt to contact the veteran by phone, and if unsuccessful, should send a second letter to obtain the missing information.

Once the PIES reconstruction request is submitted by the veterans service representative, the program support assistants review the request information to ensure that records are not already available in the NPRC's registry. If records are available, the program support assistant orders the records. If records are not available, auxiliary records are needed and the program support assistants complete the required NARA form, "NPRC Search Request and Reply," using the veteran's service information from the PIES reconstruction request. These forms are printed and delivered to the NPRC daily. According to NPRC's Agency Services chief of staff, to begin the record search and retrieval process, NPRC data entry staff enter the search request information into the NPRC's case management system.

## **Locating and Handling Fire-Related Records at NPRC**

Burned files are records that were either burned or damaged in the fire or were near the fire area and sustained varying degrees of damage. The extent to which the fire affected veterans' records includes completely burned but intact records, partially burned as well as water-damaged records, and records exposed to or completely covered by mold. Despite the levels of damage, many were able to be reconstructed using various treatments.<sup>18</sup> These files, at a minimum, could be associated with a veteran and catalogued in the NPRC registry as such. These records are stored in a designated temperature-controlled area of the NPRC storage facility in acid-free boxes to preserve them and avoid further deterioration.

When the NPRC receives a request for a veteran's records that are in the burned files, the records will be retrieved and sent to the restoration team for assessment. Restoration procedures depend on the type and degree of damage, such as to what extent the records are burned, whether water damage has fused sheets of the records together, and if the paper can be handled without falling apart. Figures 3 and 4 illustrate records that were badly burned or water-damaged.

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<sup>18</sup> Reconstructive treatments include surface cleaning, removing mold and debris, flattening, mending, scanning and imaging, and humidification.



**Figure 3.** Example of burned records from the 1973 fire at the NPRC.

Source: NPRC.



**Figure 4.** Example of water-damaged records from the 1973 fire at the NPRC.

Source: NPRC.

Examples of restoration procedures include rehydration of the paper and taking infrared photos of blackened records to see if the ink will “rise” so it can be read again. These delicate records, either fully or partially restored, are placed into a protective sleeve so they can be safely handled and copied. Once copied, the protected records and any remaining burned or damaged records that could not be handled or restored are placed back into the veteran’s burned file and returned to the designated burned records storage area. To maintain preservation and avoid any additional handling, only copies of the burned file records are sent to a scanning vendor, where they are

processed and scanned into the OMPF portal and to the veteran's electronic file in the Veterans Benefits Management System (VBMS).<sup>19</sup>

The amount of time the restoration process takes depends on the extent of damage and procedures applied to restore the document. Restoring these records is not a task that can be rushed, and limited staff and time to handle these records can increase the veteran's wait time for record request completion.

## **Receiving Records from NPRC**

Once NPRC staff locate a veteran's records or auxiliary records, restore damaged records, or determine records cannot be located, this documentation is sent to NPRC's scanning vendor. The vendor scans the documents into the OMPF portal, which allows for the records to be uploaded into the veteran's electronic file in VBMS. According to the scanning vendor, these records were averaging a one-day turnaround. NPRC's Agency Services chief of staff told the audit team that the scanning vendor does not "wand" or "scan" the records when it receives them for scanning under its contract as of February 2023, which affects the NPRC's the ability to assess precisely how long it takes the vendor to scan the records once they are received. The chief of staff further explained that new scanning vendor contracts will include a requirement to facilitate additional timeliness metrics and oversight of the records retrieval and scanning process.

Program support assistants verify that requested records or a response indicating no records were found are uploaded to the OMPF before closing the PIES reconstruction request. Once the PIES reconstruction request is closed, the veterans service representative uploads the PIES response into the veteran's electronic file in VBMS. Using the PIES response information provided by the NPRC, veterans service representatives resume the claim review process until a claim decision is made.

In contrast to the prolonged and involved process just described, NPRC's Agency Services chief of staff explained that for requests not involving burned records, NPRC staff check out the original records from storage and send them to the vendor for scanning into the OMPF. Once the records are scanned, the original documents are returned to the NPRC where staff refile them into storage.

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<sup>19</sup> VBMS is a web-based claims processing system that allows VBA staff to establish claims, view and store documents in an electronic folder, and track evidence requested from veterans.

## Results and Recommendations

### **Finding: VBA Generally Helped Veterans Obtain Their Damaged or Destroyed Records but Could Improve Awareness and Training**

VBA is responsible for assisting veterans whose records were damaged or destroyed in the 1973 NPRC fire. However, VBA's records request system does not have the capability to track fire-related requests, and VBA was therefore unable to determine the time these requests took to complete. This limits VBA's awareness of these requests and its ability to identify any potential issues. Based on the audit team's sample review of 122 requests, in fiscal year (FY) 2022, the OIG estimated that those claims including a fire-related records reconstruction request took an average of 450 days to be completed from the date the claim was received to the date VBA decided the claim. In comparison, VBA reported for FY 2022 that, on average, all claims (fire-related or otherwise) took about 146 days from date the claim was received to the decision date.

The OIG found VBA staff did not always follow procedures for the prompt handling of these record requests as outlined in its Adjudication Procedures Manual to complete initial steps simultaneously.<sup>20</sup> Veterans service representatives generally informed veterans of the actions necessary to complete a request for fire-damaged or destroyed records; however, they did not always complete required follow-up procedures of either calling the veteran or sending an additional letter.

Additionally, when handling fire-related records requests, VBA staff were unnecessarily requesting records when information was already available either from a previous request or in a paper file format. Staff were also submitting record reconstruction requests with limited or no service information obtained from the veteran through forms or questionnaires. The process for fire-related records requests is already lengthy based on the time needed to potentially locate or reconstruct these records. The OIG estimated that performing the required steps sequentially and sometimes unnecessarily, instead of simultaneously, added 73 more days to the claims processing time for a veteran population estimated to be, on average, 87 years old at the time the claim was filed.

VBA staff were not sufficiently trained on fire-related records requests. The training on fire-related records was provided to newly hired veterans service representatives, but that training had limited information on request procedures for these records. VBA provided additional training opportunities in May 2022 on processing initial PIES requests. However, this additional training did not sufficiently address handling fire-related claims because the training

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<sup>20</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations."

material included website links to the manual and PIES user guide, but not the fire-related section of the manual.<sup>21</sup> Due to the small number of veterans who require assistance with these record requests, veterans service representatives do not see these claims often and have limited experience with handling them. According to the veterans service representatives who responded to the audit team's survey, only an estimated 47 percent process fire-related PIES requests at least once yearly and an estimated 16 percent process these requests monthly.

Focusing solely on the time for restoration, in FY 2021, the COVID-19 pandemic caused delays in the NPRC's restoration of burned files, resulting, according to the NPRC's records, in an average restoration period of about 93 days. This average improved to approximately 37 days in FY 2022, and 28 days by March 2023. While the NPRC leaders meet with St. Louis VA regional office leaders weekly to discuss the status of PIES requests, the NPRC's Agency Services chief of staff indicated that the process of closing PIES requests could use improvement.

The finding is based on the following determinations:

- VBA has limited tracking capabilities for and awareness of fire-related records requests.
- VBA staff did not follow procedures when handling fire-related records requests.
- VBA staff generally informed veterans of the actions needed to complete fire-related records requests but did not always perform follow-up actions as required.
- VBA training lacks sufficient instruction for handling fire-related records requests.
- NPRC reduced the average time to complete fire-related records requests.

## What the OIG Did

The audit team reviewed a sample of 122 out of 1,788 completed PIES reconstruction fire-related requests from October 1, 2021, through September 30, 2022, (FY 2022) to determine if VBA staff followed procedures in the Adjudication Procedures Manual, as well as the number of days it took to complete the requests. The team reviewed veterans service representative and program support assistant trainings for content concerning the handling of fire-related records as well as procedures for handling fire-related claims.

The audit team developed and deployed a national electronic survey to a sample of 340 veterans service representatives at VBA's 57 regional offices and three additional offices reported by VBA to have veterans service representatives, from November 17, 2022, to January 23, 2023.

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<sup>21</sup> VA Manual 21-1, "Fire-Related Records, Supplementary or Substitute Records, and Records for Unique Situations."

The survey collected information about training they received with respect to fire-related records requests; 286 representatives responded to the survey (84 percent).

Additionally, the audit team interviewed the director, assistant director, two quality review specialists, and four veterans service representatives at the St. Louis VA regional office. The team also interviewed the assistant chief, section chief, management analyst, and five program support assistants in the Centralized Support Division. And finally, the team interviewed the chief of staff at the NPRC. See appendix A for more details about scope and methodology.

## **VBA Has Limited Tracking Capabilities for and Awareness of Fire-Related Records Requests**

PIES does not have the capability to track all types of fire-related records requests. The system can only potentially identify as fire-related those requests where the initial responses from the program support assistants are returned to the veterans service representatives indicating the records may be fire-related and a subsequent reconstruction request is completed. However, these reconstruction requests are not being used exclusively to obtain fire-related records. During the review, the audit team found 54 instances of reconstruction requests being submitted for records that were not fire-related. Therefore, the OIG estimated that about 1,400 reconstruction requests were fire-related.<sup>22</sup> Based on the audit team's sample review of 122 requests, the OIG estimated those that included a fire-related records reconstruction request took an average of 450 days to be completed from the date the claim was received to the date VBA decided the claim.

Using available PIES data, the audit team was able to estimate the average number of processing days for each stage of the request process. Although the audit team reviewed a sample of 122 PIES reconstruction requests, to obtain an estimate representative of each stage of the process estimated averages were calculated based on the number of sampled requests that had complete documentation or followed the correct order of procedures. More information about these estimates is included in appendix B.

The OIG estimated the total processing time from the date the claim was received to the date the veterans service representative submitted the PIES reconstruction request averages 190 days, which is the initial stage of the PIES request process. Table 1 shows the estimated average number of days for each stage of the initial PIES request process.

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<sup>22</sup> VA OIG statistician's projection of the number of fire-related PIES reconstruction requests based on the team's sample data analysis finding reconstruction requests not used to obtain fire-related records.

**Table 1. Estimated Initial PIES Request Process Stages**

Process stage	Average number of days
From date claim received (A) to PIES initial "Request for Information" (B)	18
From PIES initial "Request for Information" (B) to PIES reconstruction request submitted (C)	170
Total time from date claim received (A) to PIES reconstruction request submitted (C)	190

Source: VA OIG analysis.

Note: Due to estimations and rounding, numbers in table do not sum.

Since part of the process is also completed manually by the program support assistants, the audit team was unable to use the PIES data to determine how long it takes after a PIES reconstruction request is submitted. PIES data only show when a program support assistant closes the PIES request, but do not identify when the documents provided by the NPRC were scanned into the veteran’s file. The team had to manually retrieve dates for each sample by reviewing the upload date for scanned documents in the veteran’s VBMS file. The audit team also could not determine when the records request was transferred to the NPRC or when documents were scanned, only when documents were uploaded to the veteran’s VBMS file. To determine how long it took from PIES request to closure, the team manually reviewed VBMS documentation for its sample.

The OIG estimated the average time from date of claim to closure of the PIES reconstruction request was 430 days. Table 2 reflects the estimated average processing time for stages handled by the Centralized Support Division, NPRC, or the scanning vendor.<sup>23</sup>

**Table 2. Estimated PIES Reconstruction Request Processing Times Post-Veterans Service Representative Stages**

Process stage	Average number of days
From PIES reconstruction request (C) submitted to documentation scanned into VBMS (D)	260
From documentation scanned into VBMS (D) to PIES reconstruction request closed (E)	29
Total time from reconstruction PIES request (C) submitted to PIES reconstruction request closed (E)	240

<sup>23</sup> The following stages in the process could not be estimated due to a lack of data or the absence of dates in documentation: number of days from when PIES reconstruction request was sent from VBA’s program support assistants to the NPRC, and number of days from when the NPRC sent records to the scanning vendor.

Process stage	Average number of days
Total time from date claim received (A) to PIES reconstruction request closed (E)	430

Source: VA OIG analysis.

Note: Due to estimations and rounding, numbers in table do not sum.

Once the PIES request has been closed, the veterans service representatives are able to continue the claim review process by checking PIES for a response and then uploading a screenshot of the response to the veteran’s file in VBMS. The audit team reviewed uploaded documentation in VBMS to estimate how long the process was taking once the PIES request was closed until a claim decision was made. Table 3 provides the estimated average processing times for steps which occur after the PIES reconstruction requests are closed and the time for claims needing a PIES reconstruction request for auxiliary records to be completed.

**Table 3. Estimated PIES Reconstruction Request Processing Post-Closure Stages**

Process stage	Average number of days
From PIES reconstruction request closed (E) to PIES request response uploaded to VBMS (F)	23
From PIES response uploaded to VBMS (F) to claim decision (G)	61
From PIES reconstruction request closed (E) to claim decision (G)	75
Total time from date claim received (A) to claim decision (G)	450

Source: VA OIG analysis.

Note: Due to estimations and rounding, numbers in table do not sum.

As illustrated by the audit team’s estimations in tables 1 through 3, VBA was not able to specify how long it takes staff to process fire-related records requests using the available PIES and claim data. VBA staff interviewed by the audit team indicated that adding a corporate flash would be a helpful improvement to alert veterans service representatives of the fire-related procedures.<sup>24</sup> A corporate flash would also allow VBA to track and identify the number of veterans who have been confirmed to have fire-related damaged or destroyed records and improve VBA’s awareness of claims requiring fire-related record requests. While the flash would not be available

<sup>24</sup> Corporate flashes are claimant-specific indicators that represent an attribute, fact, or status that may occasionally change, such as former prisoner of war, blind veteran, and homeless. Regional office staff (veterans service representatives) are responsible for identifying claimants’ records that require flashes, inputting flashes, and removing flashes when they no longer apply.

on the initial claim filed by the veteran, adding a flash to subsequent claims would alert veterans service representatives to the veteran's records being fire-related and direct them to the procedures in the manual that should be followed.

## **VBA Did Not Follow Procedures When Handling Fire-Related Records Requests**

The OIG estimated from a sample of 122 completed PIES fire-related reconstruction requests that about 1,100 of 1,400 completed requests had procedural deficiencies (80 percent). Of those completed requests, veterans service representatives were not following procedures in the order outlined in the manual for medical treatment records and military service records for an estimated 44 and 22 percent of the time, respectively.<sup>25</sup> These deficiencies increased claims processing time by an estimated average of 73 days for a population of veterans estimated to be, on average, 87 years old at the time the claim was filed.

The procedural deficiencies primarily consisted of veterans service representatives not providing the required letter informing veterans their records may be fire-related along with the necessary questionnaire or form to obtain more information at the time the initial records requests were completed. Further, on a few occasions, the veterans service representatives did not use available information from the veterans' VA claims files to complete the reconstruction of medical or service records PIES requests. VBA concurred with the procedural deficiencies and stated that although veterans service representatives did not complete the procedures in the order and manner prescribed in the manual, this did not affect the veterans' final benefits decisions.<sup>26</sup>

The manual states that when veterans service representatives send the letter informing veterans their records may have been affected by the fire, it should also include the "Request for Information Needed to Reconstruct Medical Data" or the "Questionnaire About Military Service" form, or both, to be completed and returned within 30 days.<sup>27</sup> Table 4 shows the letter's instructions to the veteran for each type of form.

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<sup>25</sup> VA Manual 21-1, "Requesting Reconstruction of a Veteran's Medical Records," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(b); VA Manual 21-1, "Requesting Reconstruction of a Veteran's Military Service Records," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(e). The requests for medical treatment and military service records follow the same procedures in the manual, but the team reviewed those types of records requests separately to obtain as much detail as possible as to how the procedures were not followed.

<sup>26</sup> VA Manual 21-1, "Requesting Reconstruction of a Veteran's Medical Records."

<sup>27</sup> VA Manual 21-1, "Requesting Reconstruction of a Veteran's Medical Records." VA Manual 21-1, "Requesting Reconstruction of a Veteran's Military Service Records."

**Table 4. Fire-Related Records Letter Language**

NARA form	Letter language
NA Form 13055: "Request for Information Needed to Reconstruct Medical Data"	"The enclosed NA Form 13055 should be completed in detail and returned in order that we may request a thorough search be made for military medical records in support of your claim. Please note that the date(s) of treatment should be as specific as possible, preferably at least month and year. If you provide only the year, the National Archives will be unable to locate medical records due to the amount of records stored at their facility. In order to provide additional assistance with your claim, please submit a copy of any and/or all pertinent military personnel service records that may be in your possession."
NA Form 13075: "Questionnaire About Military Service"	"The enclosed NA Form 13075 should be completed and returned in order that we may verify military service dates and character of discharge. You should also submit copies of any discharge documents, military orders, or military award documents that you have in your possession. An original, or a certified copy of your discharge showing dates of service and character of service is proof of service and may be submitted in place of the completed NA Form 13075 and supporting documents."

Source: VBMS.

Table 5 shows the estimated number of errors by procedural error type. Some sampled requests contained more than one procedural deficiency; therefore, the estimates by type of procedural error in table 5 exceed the 1,100 estimated fire-related PIES requests containing an error.

**Table 5. Types of Procedural Errors Made When Handling Fire-Related Record Requests**

Procedural error	Estimate and percent
"Request for Information" and "Request for Information – Medical Data" were not sent simultaneously	600 (44)
"Request for Information" and "Request for Information – Military Service" were not sent simultaneously	300 (22)
"Request for Information – Medical Data" follow-up (letter/phone call) was not completed	340 (25)
Request for medical data or military service reconstruction was not necessary	120 (9)

Source: VA OIG analysis.

While these procedural deficiencies are not believed to have affected the claims decisions, they did increase claims processing time. The fire-related procedures explained in the manual are meant to reduce claims processing time by having veterans service representatives proactively send letters to notify and collect additional information. Instead of following the manual, some

service representatives were waiting to receive a PIES response indicating the records may be fire-related.<sup>28</sup>

The sample review found that veterans service representatives were applying outdated manual procedures that had been superseded in August 2009. These historical procedures had veterans service representatives sending the fire-related letter with the additional forms after receiving a PIES response from the NPRC stating the veteran's records were fire-related.

Example 1 illustrates a situation where veterans service representatives did not apply required procedures in the prescribed order when handling a veteran's claim with fire-related records.

### **Example 1**

*A veteran submitted a claim related to hearing loss and lower back injury on August 22, 2019. A veterans service representative completed a PIES "Request for Information" on August 29, 2019. The PIES response was received on November 7, 2019, indicating that the records were fire-related. On November 12, 2019, about 75 days since the date the PIES reconstruction request was submitted, another veterans service representative sent a letter to the veteran that included the required form. The veteran returned an incomplete form on December 12, 2019. A veterans service representative telephoned the veteran on January 21, 2020, to obtain the missing information.*

*Instead, VBA staff should have simultaneously completed the PIES "Request for Information" and sent the letter including the form on August 29, 2019. As a result of veterans service representatives not following the manual's procedures, the veteran's claims processing time was unnecessarily increased by 75 days.*

The OIG's sample results were corroborated by the OIG's survey of veterans service representatives, where an estimated 81 percent responded incorrectly when asked at what point they should send the forms to collect medical and service information from veterans.

When veterans service representatives do not follow the manual's procedures, veterans whose records are fire-related may not receive notification for a minimum of 30 days due to national work queue suspense times.<sup>29</sup> Veterans service representatives' workload is distributed through the national work queue. If a claim needs additional information, processing on it is suspended for 30 days to allow time for the veteran to respond or provide the necessary documents or

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<sup>28</sup> VA Manual 21-1, "Requesting Reconstruction of a Veteran's Medical Records"; VA Manual 21-1, "Requesting Reconstruction of a Veteran's Military Service Records."

<sup>29</sup> The National Work Queue is a workload distribution tool that uses electronic claims processing technology within VBMS. The National Work Queue centrally manages the national claims workload by prioritizing and distributing claims across VBA's network of regional offices.

information. A suspension may be repeated multiple times if the veterans service representative is still waiting for information when the suspense period expires.

The OIG estimated claims processing time was increased by an average of 73 days because veterans service representatives waited to send the required letter and forms after submitting the initial PIES request instead of sending them at the same time as required. Further, based on the team's sample, claims in the national work queue were, on average, suspended at least two times, equating to an estimated additional 60 days before being processed. This affected the overall timeliness of the claims handling process for veterans.

## **VBA Generally Informed Veterans of Actions Needed to Complete Fire-Related Records Requests, but Did Not Always Perform Required Follow-Up Actions**

By receiving the letter explaining the fire-related procedures, veterans generally were informed of the actions necessary to complete a request for fire-related records. However, the OIG estimated veterans service representatives did not complete required follow-up procedures for about 340 reconstruction requests (25 percent).<sup>30</sup> In other words, when medical or military service information request forms returned by a veteran are incomplete, it is required that the veterans be contacted by phone or sent an additional letter to obtain missing information before submitting a records reconstruction request.<sup>31</sup> When this is not done it reduces the likelihood that auxiliary records can be found.

Records reconstruction requests direct the NPRC to search for auxiliary records in place of the destroyed military or medical personnel records. The location of these auxiliary records takes additional time because they are stored by date rather than veteran name, so NPRC staff must search the facility's records for the period identified by the veteran. Other records are stored on microfiche in a similar manner and require staff to search through the images by date to attempt locating the veteran's records, if available. Receiving complete and accurate medical treatment and service history such as location and an accurate date range is necessary for the NPRC to successfully locate these records. If the veterans service representative does not assist the veteran to accurately recall the period of service or obtain additional service information that could indicate when or where the veteran served, it could affect the NPRC staff's ability to locate documents.

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<sup>30</sup> VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13055," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(c); VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13075," November 17, 2021, sec. 3.ii.2.f in *Adjudication Procedures Manual*, topic 1(f).

<sup>31</sup> VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13055"; VA Manual 21-1, "Action to Take When a Claimant Fails to Return a Completed NA Form 13075."

By not following the required procedures directing them to contact the veteran, veterans service representatives can affect the NPRC's ability to locate records for the veteran.

Example 2 illustrates veterans service representatives not conducting required follow-up procedures when receiving incomplete or missing service or treatment information.

### **Example 2**

*A veteran submitted a claim for hearing loss on June 14, 2021. A veterans service representative completed a PIES "Request for Information" on June 16, 2021. On October 20, 2021, another veterans service representative sent a letter to the veteran that included the required form. The veteran returned an incomplete form on December 20, 2021. The form did not contain treatment dates, the type of treatment received, or the veteran's signature. The PIES response received on May 2, 2022, indicated that the veteran's service treatment records and personnel file were fire-related. The audit team's review of the veteran's claims file did not show that a phone call was made, or a letter was sent to the veteran to obtain the missing information, as required. As a result of veterans service representatives not following manual procedures, the "Request for Information Needed to Reconstruct Medical Data" was submitted with incomplete information and the records were not located.*

## **VBA Training Lacks Sufficient Instruction for Handling Fire-Related Records Requests**

VBA's own special reviews have identified concerns with how veterans service representatives are processing PIES requests, including not following fire-related procedures. Training was provided to veterans service representatives to address the PIES request processing deficiencies, but did not include material on how to process fire-related records requests.

The audit team reviewed fire-related records request training materials for both the veterans service representative and the program support assistant positions and found that while the support assistants received training presentations with reference materials, the fire-related training content for veterans service representatives was minimal and outdated for about 17 months. As a result, veterans service representatives training needs improvement to ensure these staff remain proficient with process requirements, such as when to send required forms and conduct follow-up actions. Sufficient training supports efficient claims processing and avoids duplication of work that causes veterans to wait longer for decisions on their claims.

## VBA Special Reviews on PIES Requests

VBA has identified concerns with how veterans service representatives are processing PIES requests, as evidenced in the results of its 2022 and 2023 reviews.<sup>32</sup> Results of the reviews were shared with VBA's senior leaders in its headquarters and regional offices. The review published in May 2022 found that veterans service representatives did not follow procedures to properly review existing records before requesting additional evidence and were not following fire-related records procedures. The February 2023 review reported the same types of errors with a decrease in accuracy for handling PIES requests increasing the error rate from about 40 percent in the 2022 report to about 48 percent in the 2023 report.

On May 6, 2022, the Centralized Support Division provided feedback to VBA central office on veterans service representative training materials prepared by Compensation Service pertaining to how to submit PIES requests. The training sessions focused on the veterans service representatives submitting an initial PIES request for records and did not address the procedures that should be taken if the veteran's discharge date meets the criteria for potentially fire-damaged or destroyed records. The feedback focused on veterans service representatives providing the correct veteran information such as the name the veteran served under and branch of service, not fire-related records requests.

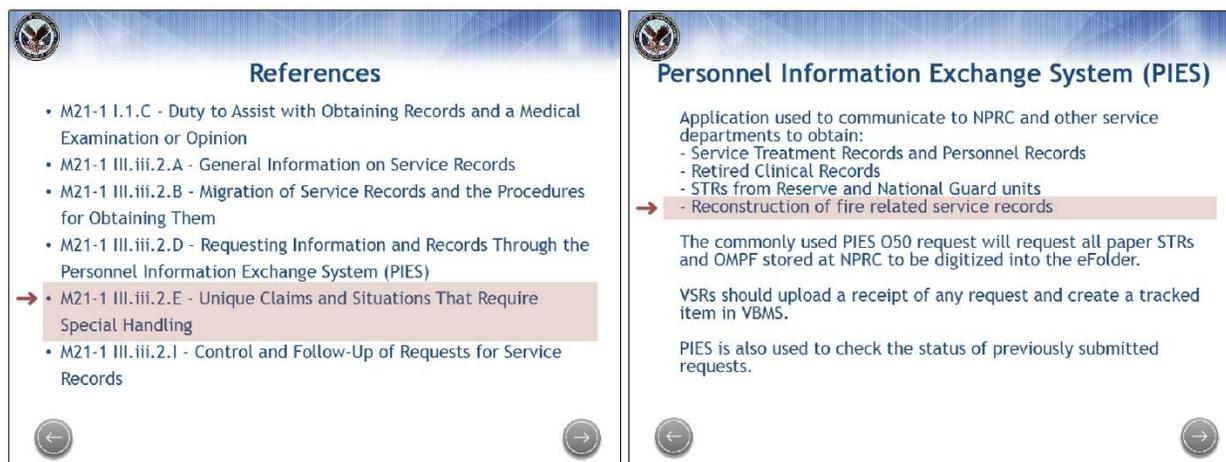
According to the Compensation Service's internal controls and risk management officer, this mandatory PIES training course that included fire-related records request information was released in VA's training system on May 18, 2022. However, the audit team's review of this training determined that it focused on how to complete the initial PIES request and did not specifically address how to handle fire-related records requests. Fire-related content was not immediately viewable or presented in the training material content to make veterans service representatives aware of the fire issues, veterans affected, and additional procedures required, such as providing the required letter informing veterans their records may be fire-related along with the necessary forms to obtain more information at the time the initial records requests were completed. The training provided separate reference material links to the PIES user guide and various manual sections but did not include a reference or training slides directing staff to the fire-related section of the manual. These material links were included as "references" only and viewing them was not required to complete the training. Moreover, of the six references, only one link for the PIES user guide contained information pertaining to fire-related records requests.

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<sup>32</sup> VBA, Compensation Service Special Review, *Personnel Information Exchange System 099 Requests*, May 13, 2022; Special Focused Review, *Quality Assurance Personnel Information Exchange System 099 Requests*, February 13, 2023. A special-focused review is an evaluation conducted by VBA's Compensation Service into topics of special interest or where a need has been identified to assess consistency and compliance based on current policy and procedures.

## Limited Training Provided to Veterans Service Representatives for Fire-Related Records Requests

The only time veterans service representatives received required training on how to handle fire-related records requests was during their initial training as new employees. This training consisted of a brief mention of fire-related records requests and a single bullet on one training slide. The training also contained a list of references to the manual in the introduction. The training material included part of the manual that no longer existed as of September 30, 2021, having been revised and relocated to other sections of the manual. Veterans service representatives were provided incorrect reference materials for almost 17 months until this specific training was updated in March 2023. Figure 5 shows the training slides from the veterans service representative training that contained the outdated manual reference to “Unique Claims and Situations That Require Special Handling” and the single mention of fire-related records in the training.



**Figure 5.** Excerpt from VA course: “VSR [veterans service representative] VIP Pre-D [Pre-Discharge] Obtaining Service Records,” December 2020 and August 2022.

Source: VA Talent Management System.

In March 2023, VBA updated the training to include references to the manual on the title slide for a link to the fire-related section. However, on the actual training slide where the PIES request process is discussed and reconstruction of fire-related service records is mentioned in one bullet, a link to the fire-related section of the manual was not included with the other references in this section.

VBA does not require specific fire-related records request training for veterans service representatives. According to the internal controls and risk management officer, mandatory PIES request training provided in May 2022 is available outside of the new employee training and can be self-assigned, but it does not contain fire-related records request content. Further, during the audit scope period, veterans service representatives were not being directed to the correct section

of the manual in the new employee training. Those reviewing the existing training may not make the connection to the correct section of the manual as it is not referenced with the training portion on fire-related records requests.

In contrast to the veterans service representatives, the program support assistants perform searches for records and respond to PIES requests based on documents received or not available at the NPRC. The team found the program support assistants had training resources, such as slide presentations and job aids, that specifically pertained to fire-related records requests.

### **Staff's Limited Experience with Fire-Related Records Requests**

Due to the small population of veterans who require assistance with these requests, most veterans service representatives did not process these claims often and therefore had limited experience with handling them. From the survey responses, 273 of the 286 respondents were determined to be veterans service representatives from 2018 to 2023. Based on the 273 veterans service representative responses, the OIG estimated only 47 percent of representatives process fire-related PIES requests at least once yearly, and only 16 percent process these requests monthly. In comparison, an estimated 20 percent of veterans service representatives responded that they process non-fire-related PIES requests at least once a month, with an estimated 35 percent processing them weekly.

### **NPRC Reduced Average Time to Complete Fire-Related Records Requests**

NPRC staff said they were still working through a COVID-19 pandemic backlog during FY 2022 but were able to reduce the average restoration time to approximately 37 days from about 93 days the year before.<sup>33</sup> As of March 18, 2023, the restoration team was averaging about 28 days to restore burned files so they can be safely copied and scanned.

According to NPRC reports, for FY 2022, the NPRC processed 23,649 requests to loan or transfer fire-related records (this includes burned records and those exposed to burned records) for VBA with an average of about 15 days processing time. According to an NPRC preservation specialist, records exposed to burned or water-damaged records are stored in the same temperature-controlled area and require special handling as they are susceptible to hazards such as mold from being in proximity to records damaged in the fire.

Of these 23,649 requests, 4,856 were for burned records requiring restoration and averaged about 37 days' processing time. In comparison, for non-fire-related file requests, the NPRC reported an

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<sup>33</sup> All processing and restoration times cited come from NPRC's records. The OIG did not audit the NPRC and did not validate the numbers.

average of about four days to locate and send records for scanning in FY 2022 and FY 2023 (as of March 18, 2023).

While the NPRC leaders meet with St. Louis VA regional office leaders weekly to discuss the status of PIES requests, the NPRC's Agency Services chief of staff indicated that the process of closing PIES requests could use improvement. There is no way to automate the PIES request closure in conjunction with the scanning of the veteran's records into the OMPF portal. PIES requests have to be manually closed by Centralized Support Division staff before veterans service representatives are permitted to continue with the claims process.

## **Conclusion**

Because of the advanced age of the veteran population affected and the complex process involved in reconstructing records, Congress required the OIG to assess VBA's assistance to veterans whose records might have been damaged or destroyed by the 1973 fire at the NPRC. It is critical that recommendations are not only effective but can be implemented quickly in order to best serve this vulnerable veteran population. VBA could not specifically identify how long it takes to process all fire-related records requests and did not have a way to identify veterans' files determined to have fire-related records, such as a corporate flash. Further, staff did not receive sufficient training for processing them. While VBA staff generally informed veterans of the actions needed to complete fire-related records requests, they did not always follow procedures or perform follow-up actions when required. By implementing the OIG's recommendations to instruct veterans service representatives on the process and making sure they follow all steps outlined in the procedures manual and by adding a process to identify and track veterans with fire-related records, VBA can better ensure these veterans receive compassionate service in a timely manner.

## **Recommendations 1–3**

The OIG made three recommendations to the under secretary for benefits:

1. Establish a process to identify and track veterans' files for those determined to have fire-damaged or destroyed records, such as adding a corporate flash, and update the Adjudication Procedural Manual indicating when veterans service representatives should apply such procedures.
2. Instruct veterans service representatives on the process for requesting service treatment and military service records for fire-related records, which includes more specific guidance on what information is required for the National Personnel Records Center to locate veterans' records.

3. Ensure veterans service representatives are made aware of and follow steps as outlined in the manual for when to send required forms and conduct follow-up contact with veterans.

## VA Management Comments

The under secretary for benefits concurred with recommendations 1 through 3 and provided action plans for all recommendations. The actions proposed by VBA are detailed in appendix C. VBA's responses to the recommendations follow:

- **Recommendation 1.** VBA will establish a process to identify and track veterans' files for those determined to have fire-damaged or destroyed records. In addition, VBA will update its Adjudication Procedures Manual indicating when and how claims processors should apply the new procedures. The target completion date for these planned actions is January 31, 2024.
- **Recommendation 2.** VBA is developing a "Reconstructing Fire-related Records" Job Aid and will update training materials to include additional content on fire-related records. VBA also plans to incorporate any process updates made to identify and track files for those determined to have fire-damaged or destroyed records as described in recommendation 1. The target completion date for these planned actions is March 31, 2024.
- **Recommendation 3.** VBA will incorporate internal controls in accordance with processes and procedures to align with development and implementation of recommendations 1 and 2. The target completion date for these planned actions is May 1, 2024.

## OIG Response

VBA's corrective action plans for recommendations 1 through 3 are responsive to the intent of these recommendations. The OIG will monitor implementation of all the recommendations by VBA and will close the recommendations when it receives sufficient evidence demonstrating progress in addressing them.

## Appendix A: Scope and Methodology

### Scope

The audit team conducted its work from August 2022 through August 2023. The team reviewed a sample of completed Personnel Information Exchange System (PIES) service treatment and military service record reconstruction requests from the National Personnel Records Center (NPRC) from October 1, 2021, through September 30, 2022 (fiscal year 2022).

### Methodology

To accomplish the audit objective, the audit team identified and reviewed regulations, policies, procedures, and guidelines related to processing fire-related PIES reconstruction requests. The team conducted a site visit at the Veterans Benefits Administration's (VBA) St. Louis, Missouri regional office and interviewed the director, assistant director, section chief, training analyst, veterans service representatives, supervisory program support assistants and program support assistants to obtain information about processing PIES reconstruction requests and training. Additionally, a site visit was conducted at the National Archives and Records Administration's NPRC where the audit team interviewed the assistant director, toured the facility, and observed the record storage and retrieval process as well as the fire-damaged records storage and restoration process.

The team reviewed a stratified random sample of PIES reconstruction requests for either medical treatment, military service records, or both, which were completed in FY 2022. Although the population for the universe includes veterans who were discharged from the Army between November 1, 1912, and January 1, 1960, and from the Air Force between September 25, 1947, and January 1, 1964. The team used VBA's electronic systems, including the PIES and Veterans Benefits Management System (VBMS) to assess whether the requests were processed according to VBA's Adjudication Procedures Manual.

The audit team conducted a web survey of 340 veterans service representatives at 57 VBA regional offices and three additional offices reported by VBA to have veteran service representatives, between November 17, 2022, to January 20, 2023, to collect information about representatives' training, knowledge of VBA's fire-related reconstruction request procedures, and actions necessary to adhere to procedures for assisting claimants with obtaining fire damaged or destroyed records.

The team received 286 surveys for a response rate of 84 percent, and then reviewed and analyzed the responses and followed up for clarification or additional information as needed. The survey participants were statistically sampled from the estimated 5,951 veterans service representative population. Survey responses were weighted to create population estimates. More detail about the sample design and estimates is included in appendix B.

Surveys are self-reported data, which the audit team could not independently verify without conducting site visits. However, the team took steps to protect data, which included limiting respondents from submitting survey responses more than once. Respondents could not change their answers once the survey was submitted. Access to the survey was limited to a list of preprogrammed email addresses.

## Internal Controls

The audit team assessed the internal controls significant to the audit objective. This included an assessment of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring.<sup>34</sup> In addition, the team reviewed the internal control principles associated with the objective. The team identified the following two components and three principles associated with the audit objective and proposed recommendations 1 and 2 in the finding to address the deficiencies identified in the following controls:<sup>35</sup>

### Component 3: Control Activities

- Principle 12: Management should establish and deploy policies and procedures that respond to risks in internal control system to achieve entity's objective.

### Component 4: Information and Communication

- Principle 14: Management should use quality information to communicate internally and support internal control system.
- Principle 15: Management should use quality information to communicate externally and support internal control system.

The percentage of fire-related claims being selected for a quality review is small limiting the opportunity to identify and correct any errors or deficiencies in fire-related claims processing.

## Fraud Assessment

The audit team assessed the risk that fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements, significant within the context of the audit

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<sup>34</sup> Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

<sup>35</sup> Since the audit was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

objectives, could occur during this audit. The team exercised due diligence in staying alert to any fraud indicators by

- Soliciting the OIG's Office of Investigations for indicators,
- Reviewing OIG hotline complaints and concerns for indicators, and
- Conducting fraud assessments to identify fraud risks significant to the objective.

The VA Office of Inspector General (OIG) did not identify any instances of fraud or potential fraud during this audit.

## **Data Reliability**

The audit team used computer-processed data from VBA's Corporate Database and PIES. To test for reliability the team determined whether any data were missing from key fields, such as the veteran's branch of service and file number, or if the PIES request was completed outside the timeframe requested. The team also assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Additionally, the team compared the veterans' names and file numbers for 29 requests submitted within PIES and compared the information found in VBMS. Testing disclosed that these data were sufficiently reliable for the audit objective. Comparison of the data against the information and documents found in VBMS did not disclose any issues with data reliability.

The audit team also used computer-processed data provided by VBA from the Workforce Information Tool to determine the population of veterans service representatives from which to select a random, representative sample to survey. Veterans service representative data was pulled as of October 30, 2022. Testing disclosed that this data was sufficiently reliable for the audit objective. The survey achieved an 84 percent response rate. Comparison of the data against veterans service representatives who did not respond to the survey showed that there had been some changes in employment status that were not reflected in the Workforce Information Tool, or that individuals coded as veterans service representative were not in fact working in this capacity.

## **Government Standards**

The OIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

## Appendix B: Statistical Sampling Methodology

### Approach

To accomplish its objective, the audit team reviewed a statistical sample of Personnel Information Exchange System (PIES) reconstruction requests to determine if the Veterans Benefits Administration (VBA) followed the procedures outlined in its Adjudication Procedures Manual when assisting veterans with obtaining or reconstructing records that were damaged or destroyed during the fire. The sample included requests for service treatment records, military service records, or both.

### Population

The audit team used criteria from VBA’s Adjudications Procedures Manual to define the population and identify fire-related PIES reconstruction requests. The original audit population included 3,034 completed PIES reconstruction requests from October 1, 2021, through September 30, 2022 (audit period). For the purposes of the audit, the team selected an audit sample of 122 reconstruction requests. However, the audit team discovered that reconstruction codes in PIES were used for other than fire-related requests. To obtain the most accurate population from which to sample and to reduce out-of-scope reconstruction requests, a new data field that included the veteran’s discharge date from military service was added to further refine the universe of PIES reconstruction requests.

The new data field reduced the population from 3,034 to 1,788 completed PIES requests and affected the weight of each sample in two of the four strata into which the sample population were categorized. The statistician provided a new set of samples for the two strata affected, but the number of requests needed to be reviewed by the team remained at 122 PIES requests. The statistician also provided 80 spare sample requests to be used as replacements for any out-of-scope requests, for a total of 202 requests. The team found out-of-scope requests during the audit and used 54 of the 80 spare sample requests, bringing the total number of requests reviewed to 176. Of the 1,788 PIES reconstruction requests for the audit population, it is estimated that 1,362 requests were within the scope of this audit.

Table B.1 shows the estimated number of in-scope and out-of-scope PIES reconstruction requests.

**Table B.1. Estimated In-Scope PIES Reconstruction Requests**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
In scope (Percent)	1,362 (76)	77 (4)	1,285 (72)	1,439 (80)	122	1,400

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Out of scope (Percent)	426 (24)	77 (4)	349 (20)	503 (28)	54	430
<b>Total (Percent)</b>	<b>1,788 (100)</b>	-	-	-	<b>176</b>	<b>1,800</b>

Source: VA OIG statistician's projection of the number of in-scope PIES reconstruction requests, based on the team's sample data analysis.

Note: Numbers in table may not sum due to rounding.

## Sampling Design

The audit team selected a statistical sample of 176 requests from the population of completed PIES reconstruction requests. The population was stratified by service treatment (medical) records requests that took less than 120 days to complete, service treatment (medical) records requests that took at least 120 days to complete, military service records requests that took less than 120 days complete, and military service records requests that took more than 120 days to complete. Table B.2 shows the number of PIES requests reviewed in each of the four strata.

**Table B.2. Sample Strata**

Type of PIES reconstruction requests	Sample PIES reconstruction requests
Service treatment <120 days	10
Service treatment >= 120 days	64
Military service <120 days	22
Military service >=120 days	80
<b>Total</b>	<b>176</b>

Source: VA OIG statistician's stratified population.

## Weights

Samples were weighted to represent the population from which they were drawn, and the weights were used in the estimate calculations. For example, the team calculated the error rate estimates by first summing the sampling weights for all sample records that contained the given error, then dividing that value by the sum of the weights for all sample records.

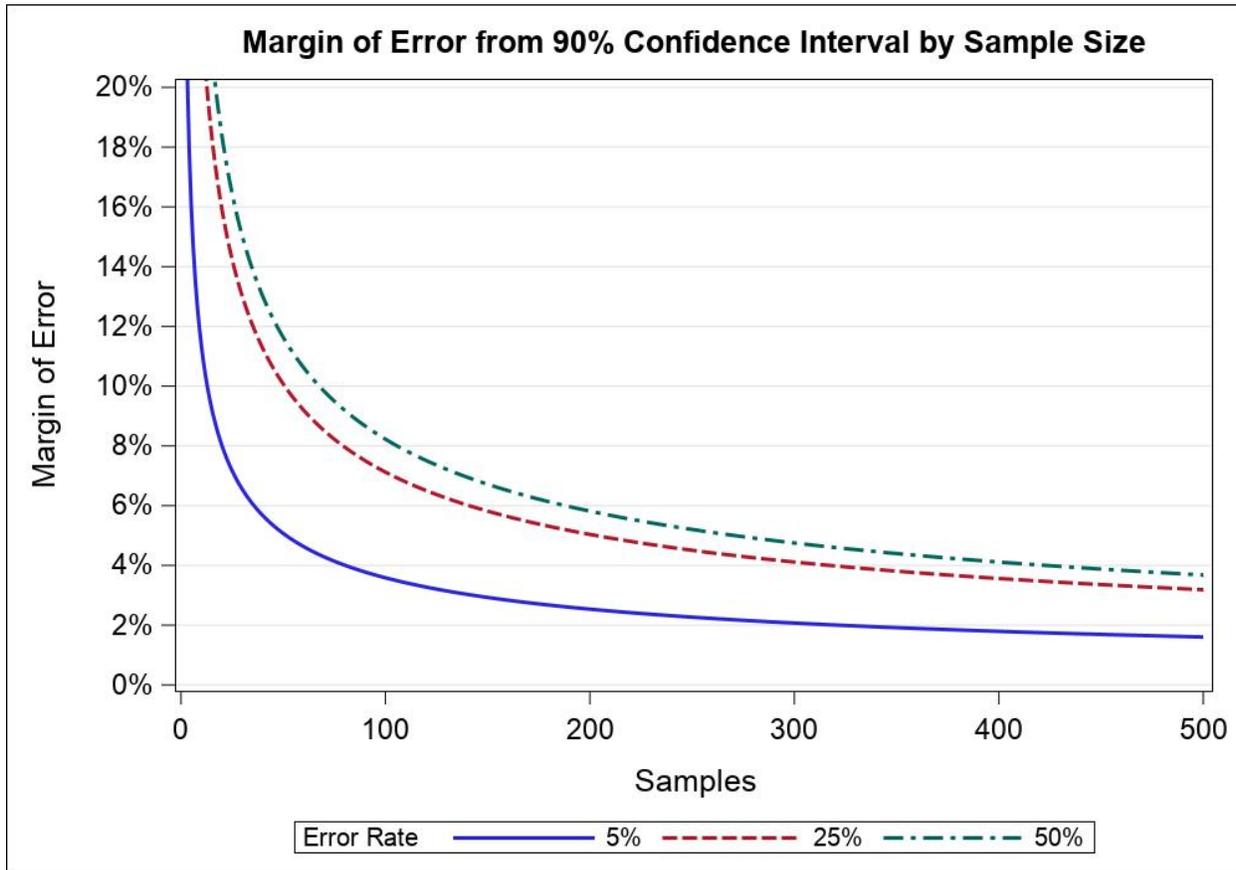
## Projections and Margins of Error

The projection is an estimate of the population value based on the sample. The associated margin of error and confidence interval show the precision of the estimate. If the OIG repeated this audit with multiple sets of samples, the confidence intervals would differ for each sample but would include the true population value 90 percent of the time.

The OIG statistician employed statistical analysis software to calculate estimates, margins of error, and confidence intervals that account for the complexity of the sample design.

The sample size was determined after reviewing the expected precision of the projections based on the sample size, potential error rate, and logistical concerns of the sample review. While precision improves with larger samples, the rate of improvement decreases significantly as more records are added to the sample review.

Figure B.1 shows the effect of progressively larger sample sizes on the margin of error.



**Figure B.1.** Effect of sample size on margin of error.

Source: VA OIG statistician’s analysis.

## Projections

Table B.3 shows the estimated projection for the number of PIES reconstruction requests containing processing errors made by VBA staff.

**Table B.3. Statistical Projections Summary for PIES Reconstruction Requests with and without Errors**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Error (Percent)	1,085 (80)	87 (6)	998 (73)	1,171 (86)	98	1,100
No error (Percent)	278 (20)	87 (6)	191 (14)	365 (27)	24	280
<b>Total (Percent)</b>	<b>1,362 (100)</b>	-	-	-	<b>122</b>	<b>1,400</b>

Source: VA OIG statistician's projection of the number of PIES reconstruction requests with errors, based on the team's sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.4 shows the estimated number of PIES reconstruction requests for which veterans service representatives did not simultaneously send the "Release of Information" form to NPRC and the "Request for Information Needed to Reconstruct Medical Data" form to the veteran, as required by the VBA's Adjudication Procedures Manual.

**Table B.4. Statistical Projections Summary for the Number of PIES Reconstruction Requests for Which the "Release of Information" and "Request Information Needed to Reconstruct Medical Data" Forms Were or Were Not Sent Simultaneously**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Forms not sent simultaneously (Percent)	598 (44)	94 (7)	504 (37)	693 (51)	43	600

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Forms sent simultaneously (Percent)	764 (56)	94 (7)	670 (49)	858 (63)	79	760
<b>Total (Percent)</b>	<b>1,362 (100)</b>	-	-	-	<b>122</b>	<b>1,400</b>

Source: VA OIG statistician’s projection of the number of PIES reconstruction requests, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.5 shows the estimated number of PIES reconstruction requests for which veterans service representatives did not send the “Release of Information” form to NPRC and the “Questionnaire About Military Service” form to the veteran, according to VBA’s Adjudication Procedures Manual.

**Table B.5. Statistical Projections Summary for the Number of PIES Reconstruction Requests for Which the “Release of Information” and “Questionnaire About Military Service” Forms Were or Were Not Sent Simultaneously**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Forms not sent simultaneously (Percent)	304 (22)	37 (3)	267 (20)	341 (25)	41	300
Forms sent simultaneously (Percent)	1,058 (78)	37 (3)	1,021 (75)	1,095 (80)	81	1,100
<b>Total (Percent)</b>	<b>1362 (100)</b>	-	-	-	<b>122</b>	<b>1,400</b>

Source: VA OIG statistician’s projection of the number of PIES reconstruction requests for which forms were not sent simultaneously, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.6 shows the estimated number of PIES reconstruction requests for which veterans service representatives did not follow up with a letter or phone call when the veteran did not return the “Request for Information Needed to Reconstruct Medical Data” or “Questionnaire About Military Service” forms.

**Table B.6. Statistical Projections Summary for PIES Reconstruction Requests for Which No Follow-Up Was Conducted**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Follow-up not conducted	335 (25)	93 (7)	242 (18)	429 (31)	24	340
Follow-up conducted	1,027 (75)	93 (7)	934 (69)	1,120 (82)	98	1,000
<b>Total (Percent)</b>	<b>1,362 (100)</b>	-	-	-	<b>122</b>	<b>1,400</b>

Source: VA OIG statistician’s projection of the number of PIES reconstruction requests without follow-up, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.7 shows the estimated number of PIES reconstruction requests where the veterans service representatives did not send “Request for Information Needed to Reconstruct Medical Data” or “Questionnaire About Military Service” forms to the veteran or sent forms that were not required.

**Table B.7. Statistical Projections Summary for PIES Reconstruction Requests With “Request for Information Needed to Reconstruct Medical Data” or “Questionnaire About Military Service” Forms Unnecessarily or Not Sent to the Veteran**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Forms were sent unnecessarily	124 (9)	64 (5)	61 (4)	189 (14)	9	120
Forms were not sent	1,238 (91)	64 (5)	1,174 (86)	1,302 (96)	113	1,200
<b>Total (Percent)</b>	<b>1,362 (100)</b>	-	--	--	<b>122</b>	<b>1,400</b>

Source: VA OIG statistician’s projection of the number of PIES reconstruction requests that did not require forms to the veteran, based on the team’s sample data analysis.

Note: Numbers in table may not sum due to rounding.

Table B.8 shows the estimated average number of days a PIES reconstruction request was delayed when veterans service representatives did not follow the procedures of sending the “Release of Information” form to NPRC and either the “Request for Information Needed to

Reconstruct Medical Data” or the “Questionnaire About Military Service” to the veteran simultaneously, according to VBA’s Adjudication Procedures Manual.

**Table B.8. Statistical Projections Summary for the Average Number of Days a PIES Reconstruction Request Was Delayed When the “Release of Information” Form and Either the “Request for Information Needed to Reconstruct Medical Data” or the “Questionnaire About Military Service” Forms Were Not Sent Simultaneously**

Average number of days	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
PIES request delayed	73	26	46	99	69	73

*Source: VA OIG statistician’s projection of the average number of days a reconstruction request was delayed when forms not sent simultaneously, based on the team’s sample data analysis.*

Table B.9 shows the estimated average number of days elapsed from the date VA received the veteran’s claim to the date the PIES reconstruction request related to that claim was closed.

**Table B.9. Statistical Projections Summary for Average Time from Date of Claim to Closure of PIES Reconstruction Request**

Average number of days	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
From date of claim to PIES reconstruction request closure	427	55	373	482	122	430

*Source: VA OIG statistician’s projection of the average time from date of claim to request closure, based on the team’s sample data analysis.*

Table B.10 shows the estimated average number of days elapsed from the date VA received the veteran’s claim to the date the PIES reconstruction request was submitted to the NPRC.

**Table B.10. Statistical Projections Summary for the Average Number of Days from the Veteran’s Date of Claim to the PIES Reconstruction Request**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from date of claim to PIES reconstruction request	192	36	156	228	122	190

Source: VA OIG statistician’s projection of the average number of days from the date of claim to submitting the reconstruction request, based on the team’s sample data analysis.

Table B.11 shows the estimated average number of days from the date the veterans service representative submitted the PIES reconstruction request to the date the program support assistant closed the PIES reconstruction request.

**Table B.11. Statistical Projections Summary for the Average Number of Days Elapsed from the Date the PIES Reconstruction Request was Submitted to the Date the PIES Reconstruction Request Was Closed**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from PIES reconstruction request to date PIES reconstruction request closed	235	49	186	285	122	240

Source: VA OIG statistician’s projection of the average number of days elapsed between submitting and closing the PIES request, based on the team’s sample data analysis.

Table B.12 shows the estimated average number of days elapsed from the date the PIES reconstruction request was submitted to the date the NPRC’s vendor scanned documents into VBMS.

**Table B.12. Statistical Projections Summary for the Average Number of Days Elapsed from the Date the PIES Reconstruction Request Was Submitted to the Date Documents Were Scanned into VBMS**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from PIES reconstruction request to date documents uploaded to VBMS	255	61	194	317	73	260

Source: VA OIG statistician’s projection of the average number of days elapsed between submitting the PIES request and scanning documents into VBMS, based on the team’s sample data analysis.

Table B.13 shows the estimated average number of days elapsed from the date the NPRC uploaded documentation in VBMS to the date the PIES reconstruction request was closed.

**Table B.13. Statistical Projections Summary for the Average Number of Days Elapsed from the Date Documents Were Uploaded into VBMS to the Date the PIES Reconstruction Request Was Closed**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from document uploaded in VBMS to close of PIES reconstruction request	29	13	17	42	66	29

Source: VA OIG statistician’s projection of the average number of days elapsed from date the NPRC uploaded documentation in VBMS to the date the PIES reconstruction request was closed, based on the team’s sample data analysis.

Table B.14 shows the estimated average number of days elapsed from the date the PIES reconstruction request was closed to the date that the NPRC uploaded its response to the PIES reconstruction request in VBMS.

**Table B.14. Statistical Projections Summary for the Average Number of Days Elapsed from the Date the PIES Reconstruction Request Was Closed to the Date the PIES Request Response Was Uploaded into VBMS**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from close of PIES reconstruction request to request response uploaded to VBMS	23	6	18	29	77	23

*Source: VA OIG statistician's projection of the average number of days elapsed from the date the PIES reconstruction request was closed to the date that the NPRC uploaded its response in VBMS, based on the team's sample data analysis.*

Table B.15 shows the estimated average number of days elapsed from the date VBA received the veteran's claim to the date VBA sent the rating decision to the veteran.

**Table B.15. Statistical Projections Summary for the Average Number of Days Elapsed from Veteran's Date of Claim to Date of Decision Rating**

PIES reconstruction request	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days from date of claim to date of rating decision	449	56	393	505	106	450

*Source: VA OIG statistician's projection of the average number of days elapsed from the date VBA received the veteran's claim to the date VBA sent the rating decision to the veteran, based on the team's sample data analysis.*

Table B.16 shows the estimated average number of days that elapsed from the veteran's date of claim to the date when the request for information was submitted.

**Table B.16. Statistical Projections Summary for the Average Number of Days Elapsed from the Veteran’s Date of Claim to the Date When Request for Information Was Submitted**

Projection name	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days elapsed from Date of Claim to Date When Release of Information Submitted	18	9	10	27	98	18

*Source: VA OIG statistician’s projection of the average number of number of days elapsed from the veteran’s date of claim to the date when the request for information was submitted, based on the team’s sample data analysis.*

Table B.17 shows the estimated average number of days elapsed from the date the PIES reconstruction request was closed to the date of the claim decision.

**Table B.17. Statistical Projections Summary for the Average Number of Days Elapsed from the Date the PIES Reconstruction Request Was Closed to the Date of the Claim Decision**

Projection name	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days elapsed from PIES reconstruction request closed to date of claim decision	75	13	63	88	87	75

*Source: VA OIG statistician’s projection of the average number of days elapsed from the date the PIES reconstruction request was closed to the date of the claim decision, based on the team’s sample data analysis.*

Table B.18 shows the estimated average number of days from the date the PIES response was uploaded to VBMS to the date of the claim decision.

**Table B.18. Statistical Projections Summary for the Average Number of Days Elapsed from the Date When the PIES Reconstruction Response Was Uploaded to VBMS to the Date of the Claim Decision**

Projection name	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days elapsed from date when PIES response uploaded to VBMS to claim decision	61	16	46	77	64	61

Source: VA OIG statistician’s projection of the average number of days from the date the PIES response was uploaded to VBMS to the date of the claim decision, based on the team’s sample data analysis.

Table B.19 shows the estimated average number of days from the date the initial PIES request for information was submitted to the date a reconstruction request was entered into PIES.

**Table B.19. Statistical Projections Summary for the Average Number of Days Elapsed from the Date When the Initial PIES Request for Information Was Submitted to the Date of PIES Reconstruction Request Was Submitted**

Projection name	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Number of days elapsed from date when initial PIES request for information was submitted to PIES reconstruction request	170	30	140	201	101	170

Source: VA OIG statistician’s projection of the average number of days from the date the initial PIES request for information was submitted to the date a reconstruction request was entered into PIES, based on the team’s sample data analysis.

Table B.20 shows the estimated average age of a veteran at the time the veteran’s claim was submitted.

**Table B.20. Statistical Projections Summary for the Average Age (in Years) of Veteran at Date of Claim**

Projection name	Estimate	90 percent confidence interval			Sample size	Rounded estimate
		Margin of error	Lower limit	Upper limit		
Average age (in years) of veteran when the veteran submitted a claim	87	1	86	88	122	87

Source: VA OIG statistician’s projection of the veterans’ average age, in years, based on the team’s sample data analysis.

### Survey Sampling Methodology

The audit team conducted a web survey of veterans service representatives. The team used statistical sampling to quantify the extent of survey results in the veterans service representative population.

The survey population included 5,951 veterans service representatives who handle veterans’ claims, including those that are fire-related, as of October 30, 2022. The survey was open to veterans service representatives from November 17, 2022, to January 23, 2023.

The audit team selected a random sample of 340 representatives out of the population of 5,951 veterans service representatives. The population was stratified by VA regional offices and categorized in 60 strata. The sample was selected with size proportional to the number of veterans service representation at each office. If an office had three veteran service representatives or less, then all veterans service representatives were selected for the sample.

The audit team received 286 submitted surveys from the 340 sampled representatives resulting in an 84 percent response rate. Of the 286 submitted surveys, 273 are used in population estimates as 13 respondents indicated they have not worked as a veterans service representative and were thus considered out of scope. The audit team excluded an additional 12 representatives from the population because they had changes in employment status. Since the excluded veterans service representatives represent others in the original survey population that may also be out of scope, the team estimates the population eligible for survey is about 5,470. Survey respondents were permitted to skip or not answer survey questions, so to obtain an estimate representative of each response, estimates were calculated based on the number of responses received for each question.

Table B.21 contains the following projections based on the survey:

1. Veterans service representatives’ PIES and fire-related PIES request-handling frequency.

2. Veterans service representatives’ knowledge of manual requirements indicating when to send National Archives forms requesting additional information from veterans to locate fire-related records.

**Table B.21. Statistical Projections Summary for Survey data**

Estimate name	Estimate number	90 percent confidence interval			Sample count	Sample size
		Margin of error	Lower limit	Upper limit		
Process claims with records that are fire-related at least once yearly—one to 11 times yearly (Percent)	2,521 (47)	306 (5)	2,216 (41)	2,827 (52)	126	270
Process claims with records that are fire-related at least once monthly—12 to 51 times yearly (Percent)	841 (16)	205 (4)	636 (12)	1,046 (19)	48	270
Process PIES requests at least once monthly—12 to 51 times yearly (Percent)	1,093 (20)	235 (4)	858 (16)	1,328 (24)	53	273
Process PIES requests at least once weekly—52 to 364 times yearly (Percent)	1,937 (35)	285 (5)	1,652 (30)	2,223 (40)	99	273
Answered incorrectly about when submitting a PIES 050 reconstruction request you are required to <u>simultaneously</u> send the veteran a letter with NA forms 13055/13075 or both* (Percent)	4,344 (81)	311 (4)	4,032 (77)	4,655 (85)	209	267

Source: VA OIG statistician’s projection of survey results based on statistical analysis of survey responses.

Note: Numbers in table may not sum due to rounding.

\* National Archives and Records Administration Form (NA 13055), Request for Information Needed to Reconstruct Medical Data; National Archives and Records Administration Form (NA 13075), Questionnaire About Military Service.

## Appendix C: VA Management Comments, Under Secretary for Benefits

### Department of Veterans Affairs Memorandum

Date: September 20, 2023

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – VBA Generally Helped Veterans Obtain Damaged or Destroyed Records  
[Project No. 2022-03522-AE-0148] (VIEWS 10727272)

To: Assistant Inspector General for Audits and Evaluations (52)

1. Attached is VBA's response to the OIG Draft Report: VBA Generally Helped Veterans Obtain Damaged or Destroyed Records.

*The OIG removed point of contact information prior to publication.*

/s/

Joshua Jacobs

Attachment

**Veterans Benefits Administration (VBA)  
Comments on OIG Draft Report**

**VBA Generally Helped Veterans Obtain Damaged or Destroyed Records**

The Veterans Benefits Administration (VBA) concurs with the findings in OIG's draft report and provides the following comments in response to the recommendations:

Recommendation 1: Establish a process to identify and track veterans' files for those determined to have fire-damaged or destroyed records, such as adding a corporate flash, and update the Adjudication Procedural Manual indicating when veterans service representatives should apply such procedures.

VBA Response: Concur. VBA will establish a process to identify and track Veteran's files for those determined to have fire-damaged or destroyed records and update the Adjudication Procedural Manual indicating when and how claims processors should apply the new procedures.

Target Completion Date: January 31, 2024

Recommendation 2: Instruct veterans service representatives on the process for requesting service treatment and military service records for fire-related records that includes more specific guidance on what information is required for the NPRC to locate veterans' records.

VBA Response: Concur. VBA is currently developing a "Reconstructing Fire-related Records" Job Aid. In addition, VBA will update training materials to add additional content on fire-related records. VBA also plans to incorporate any process updates made to identify and track files for those determined to have fire-damaged or destroyed records as described in Recommendation 1.

Targeted Completion Date: March 31, 2024

Recommendation 3: Ensure veterans service representatives are made aware of and follow steps as outlined in the manual for when to send required forms and conduct follow-up contact with veterans.

VBA Response: Concur. VBA will incorporate internal controls in accordance with processes and procedures to align with development and implementation of Recommendations 1 and 2.

Targeted Completion Date: May 1, 2024

*For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

## OIG Contact and Staff Acknowledgments

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<b>Contact</b>	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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